EPA Region 5 Records Ctr.

OSC REPORT

FOR

CHICAGO INDUSTRIAL WASTE HAULERS ALSIP, ILLINOIS

2/90

Prepared For:

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois

CONTRACT NO. 68-01-7367

TAT-05-G2-01392

TDD No. 5-8905-21

Prepared By:

WESTON-MAJOR PROGRAMS Technical Assistance Team Region V

February 1990

EXECUTIVE SUMMARY

The Emergency Response Section of the U.S. Environmental Protection Agency (U.S. EPA), Region V, initiated a removal action at the Chicago Industrial Waste Haulers (CIWH) site in Alsip, Illinois on May 25, 1989. The removal action was taken to mitigate the threats to public health and the environment posed by the presence of various waste solvents stored at this easily accessible and deteriorated facility. These materials posed threats through direct contact, fire and explosion, and through inhalation or ingestion.

Under U.S. EPA guidance, the mini-Emergency Response Cleanup Services (mini-ERCS) contractor, MAECORP, Incorporated, removed approximately 37,490 gallons of waste flammable liquids and transported the wastes to a disposal facility. All actions taken were consistent with the National Contingency Plan.

The removal was completed on June 12, 1989, at an estimated cost under control of the On-Scene Coordinator (OSC) of ______, of which \$14,464.84 was for the mini-ERCS contractor. The OSC for this project was Richard Rupert.

TABLE OF CONTENTS

		Page	<u>e</u>
LIST LIST LIST	JTIVE SUMMARY OF FIGURES OF TABLES OF ATTACHMENTS OF APPENDICES	• • • •	iv v vi
1.0	SUMMARY OF EVENTS	• • • •	.1
2.0	1.5.2 Demobilization 1.6 Community Relations		• 6 • 9
3.0	2.3 Federal Agencies		. 9 . 9
4. 0	ODC VECOLITERIOWITTOND		• >

LIST OF FIGURES

												Ē	ac	<u>je</u>
FIGURE	1	_	SITE	LOCATION	MAP.	 	• • •	 	 	 	 	 	2	2
FIGURE	2	-	SITE	MAP		 		 	 	 	 	 	3	3

LIST OF TABLES

			<u>Page</u>
TABLE	1	_	DISPOSAL SUMMARY7
TABLE	2	_	SUMMARY OF DAILY MINI-ERCS CONTRACTOR
			EXPENDITURES8
TABLE	3	-	SUMMARY OF MINI-ERCS CONTRACTOR EXPENDITURE
			BY SERVICE10
TABLE	4	_	SUMMARY OF TOTAL REMOVAL COSTS11

LIST OF ATTACHMENTS

ATTACHMENT A - TIMELINE OF EVENTS ATTACHMENT B - SITE PHOTOGRAPHS

LIST OF APPENDICES

APPENDIX A - Action Memoranda

APPENDIX B - TAT TDDs

APPENDIX C - Daily Work Orders

APPENDIX D - 1900-55 Forms

APPENDIX E - Incident Obligation Log

APPENDIX F - Site Entry/Exit Log

APPENDIX G - Hot Zone Entry/Exit Log

APPENDIX H - Site Photographs APPENDIX I - Site Safety Plan

APPENDIX J - Community Relations

APPENDIX K - TAT Cost Sheets

APPENDIX L - Site Log

APPENDIX M - Maps APPENDIX N - Equipment Log APPENDIX O - Materials Log

APPENDIX P - Analytical Data

APPENDIX Q - Chain of Custody Forms

1.0 SUMMARY OF EVENTS

1.1 Location

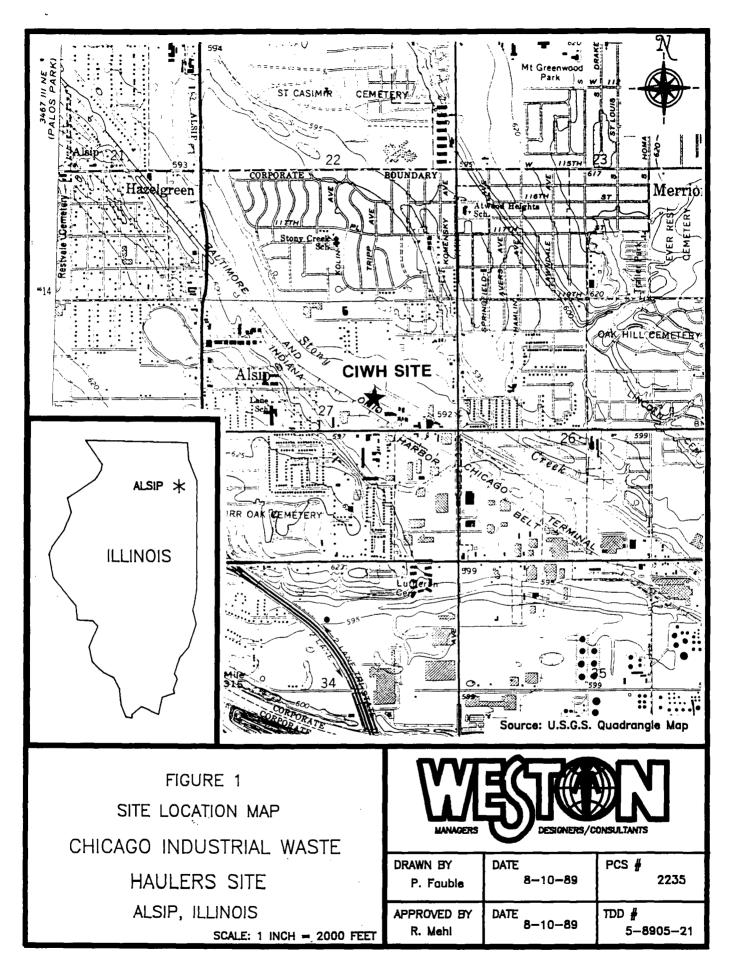
The Chicago Industrial Waste Haulers, Inc. (CIWH) site is an abandoned waste oil storage facility located at 4206 West Shirley Lane in Alsip, Illinois (Figure 1). The facility is located on a six-acre lot that is completely enclosed by a 7-foot high chainlink fence which is in disrepair. The site originally consisted of one building situated along the north fence, and 10 above-ground tanks scattered throughout the property (Figure 2). The tanks ranged in capacity from 5,000 to 15,000 gallons. Five of the tanks are surrounded by containment diking, and two tanks are mounted on truck trailers. Large sheets of steel and parts of dismantled tanks left from a previous clean-up effort are scattered throughout the site or stored in two rolloff boxes situated west of the building.

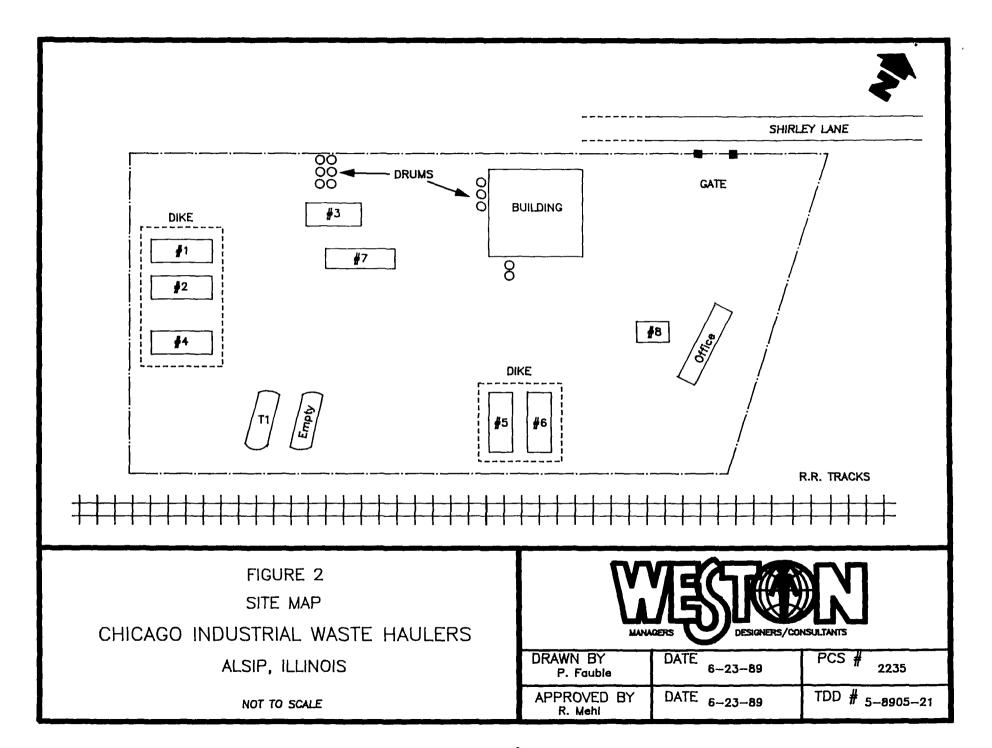
The site is bordered to the north by a vacant lot, to the south by the Baltimore and Ohio Chicago Terminal Railroad tracks, and to the northeast by Shirley Lane. The site is located in a heavily industrialized area, but a playground and residential area lie approximately 200 feet to the north of the site. A small intermittent stream, Stony Creek, flows along the northwestern boundary of the site and separates the site from the nearby residential area.

1.2 Initial Situation

CIWH began operations in 1956 under the name of Chicago Tank Cleaners, Inc. and was operated by Anthony Prunsky. In November 1985, the corporation was involuntarily dissolved by the Illinois Secretary of State and the business changed its name to CIWH. cleaned and repaired tanks, brokered waste oil from gas stations, factories, and oil spills, and transported hazardous wastes. waste oil was usually sold to an oil reclaimer or used for dust control on roads. The company discontinued use of the site after its permit to transport hazardous wastes was not renewed in 1986. Tanks filled with oil and unknown waste fluids were left abandoned on the site. Kevin Prunsky, son of Mr. A. Prunsky, is presently the owner of the CIWH facility as well as the owner and president of Pollution Control Industries of America (PCIA). PCIA acts as a broker and temporary storage facility for waste oil and solvents. PCIA is currently operating a facility in East Chicago, Indiana.

On September 30, 1984, two children were seriously injured when fumes from one of the tanks at the CIWH facility ignited. After the incident, the Illinois Environmental Protection Agency (IEPA) was notified by the Village of Alsip, and performed a site investigation at the CIWH site on October 1, 1984. Tank samples collected by the IEPA displayed Resource Conservation and Recovery Act (RCRA) ignitability characteristics.





On March 10, 1989, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to conduct a spill prevention control and countermeasure (SPCC) inspection at the CIWH site. Air monitoring conducted with an organic vapor analyzer (OVA) revealed readings of 3.5 units and 65 units above background levels near two tanks.

On March 17, 1989, the TAT accompanied U.S. EPA On-Scene Coordinator (OSC) Richard Rupert on a site investigation at the CIWH site. The site assessment report (TDD#5-8903-12) documented the presence of 24 above ground storage tanks, some labeled "PCBs" and "Flammable", an abandoned building and numerous unlabeled drums. At the time of the inspection, a crew was observed cutting tanks, removing material and containerizing waste in drums. Several tanks that were present during the SPCC inspection on March 10, 1989, had been removed from the site.

Nine samples from various tanks and tankers were collected and analyzed for F-listed solvents, polychlorinated biphenyls (PCBs), and Extraction Procedure (EP) toxicity metals. The results of the tests indicated that the sampled tanks displayed RCRA hazardous characteristics. Three of the tanks were found to have flash points below 140 degrees Fahrenheit (°F) and six tanks contained PCB levels in excess of 50 parts per million (ppm). PCB concentrations in excess of 50 ppm are regulated by the Toxic Substance Control Act (TSCA) and require specific management and disposal practices. Specific chemical compounds detected in the tanks included ethyl benzene, toluene, xylenes and methylene chloride. In addition, 5 of 11 soil sampling locations indicated PCB levels ranging from 2.3 to 50 ppm.

1.3 Threat to Public Health and/or the Environment

Based on the U.S. EPA site assessment and analytical results, conditions at the CIWH site posed a direct threat to human health and the environment. These observed conditions warranted a removal action as outlined in Section 300.65(b)(2) of the National Contingency Plan.

o Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chains;

The site is located only 200 feet from several residences and a children's playground. The deteriorated condition of the fence surrounding the site did not adequately restrict access. The potential for human exposure to flammable liquids was increased by the tanks' deteriorating condition, the lack of spill containment structures and open lids and vents. In addition, PCBs as high as 50 ppm had been detected in on-site soils.

o Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers, that may pose a threat of release; and

The open tanks and deteriorating drums posed a threat of release into the ground or the nearby stream. Analysis of samples obtained during the site assessment indicated PCB concentrations up to 50 ppm in on-site soils. This suggested that there had been releases of materials from the tanks and drums in the past. Run-off from the site could have carried contaminants into nearby Stony Creek and threatened downstream communities.

o Threat of fire or explosion.

Several of the tanks were found to contain such highly flammable liquids as benzene, ethyl ketone, xylenes and toluene. Analytical results indicated that these tanks all possessed flash points of less than 140°F. The presence of any ignition source could have resulted in a potentially dangerous explosion or fire, as was evidenced during a 1984 incident in which two children were injured when fumes from a tank on the site ignited.

1.4 <u>Attempts to Obtain a Response by Potentially Responsible Parties</u>

On April 19, 1989, the U.S. EPA, under Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, issued a unilateral Administrative Order (AO) to the owners of the CIWH facility. The CIWH president was identified as Mr. K. Prunsky, current owner of PCIA. Mr. K. Prunsky was contacted by the U.S. EPA, but he failed to respond within the terms specified by the AO.

1.5 Action Taken

The U.S. EPA commenced a removal action at the CIWH site on March 25, 1989. The removal action, implemented to eliminate the threats posed to public health and the environment, consisted of pumping and disposing of all liquid waste contained in the remaining tanks. The action was completed on July 12, 1989. The removal action was performed by the mini-Emergency Response Clean-up Services (mini-ERCS) contractor, MAECORP, Incorporated (MAECORP).

The project ceiling for the removal action was \$100,000.00. MAECORP initially mobilized a response manager, a lab technician, a foreman and three cleanup technicians. The MAECORP crew was reduced to a foreman and two cleanup technicians for later stages of the removal action. Equipment mobilized included a two-ton box truck, an explosimeter, a Bobcat 843 front-end loader and a Bobcat trailer. An emergency response trailer was mobilized for one day on May 25, 1989. An office trailer was provided by PCIA. PCIA also provided security at the site during non-working hours and 24-hour security on weekends and days of inactivity.

1.5.1 Consolidation of Liquid Waste, Sampling, Drum Staging

Between May 25 and June 12, 1989, a flammable liquid waste stream containing PCBs was identified from the contents of tanks 1,2, 4, The liquid contents on site were pumped into 5,000 gallon capacity vacuum tankers. The unpumpable sludge at the off-specification bottom of each tank was flushed with trichloroethylene (TCE), and the TCE-sludge mixture was then pumped into a tanker truck. Of the 37,490 gallons of material removed from the five tanks, 1,050 gallons was the off-specification TCE.

All transportation and disposal of the waste was arranged and funded by PCIA. The initial tanker was transported to the ENSCO Disposal Facility (ENSCO) in Eldorado, Arkansas. Subsequent tankers were transported to the PCIA facility in East Chicago, Indiana for storage and eventual disposal at ENSCO. The waste categories, quantities, disposal facilities, dates shipped and transporters are presented in Table 1.

On May 26 and June 1, 1989, liquid samples were collected from tanks 5 and 6, tanker T1, and one drum. In addition, 10 soil samples were collected from the northeast corner of the site. Samples were analyzed for incineration parameters and total PCB content by Grace Analytical Lab in Berkeley, Illinois.

On June 8, 1989, MAECORP staged 16 drums of paint waste from the west side of the site to the inside of the former office building.

1.5.2 Demobilization

All activities under this phase of removal were completed by June 12, 1989. After this date, responsibility for the next phase (Phase II) of the clean-up belonged to the potentially responsible party (PRP), CIWH. Phase II of the removal will involve the decommissioning and disposal of all above-ground tanks as well as the eventual treatment of all contaminated on-site soils.

1.6 Community Relations

No formal community relations plan was developed, but a fact sheet was distributed and an Information Repository was set up at the Alsip Village Hall. U.S. EPA OSC Richard Rupert also maintained a rapport with local residents and reporters throughout the action.

1.7 Cost Summary

MAECORP was the prime mini-ERCS contractor for the CIWH removal. Site activities commenced on May 25, 1989, and were concluded on June 12, 1989. Table 2 summarizes daily expenditures for services provided by the clean-up contractor. As of June 12, 1989, total

TABLE 1 DISPOSAL SUMMARY

WASTE CATEGORY	QUANTITY	DISPOSAL ¹ FACILITY	DATE ² SHIPPED	TRANSPORTER			
Waste Flammable Liquid,	4,440 gallons	ENSCO	5/25/89	ENSCO			
n.o.s. (contains polychlorinated	3,900 gallons	ENSCO	6/1/89	Comm. Cartage			
biphenyls)	4,950 gallons	ENSCO	6/8/89	PCIA			
	4,300 gallons	ENSCO	6/8/89	PCIA			
	5,100 gallons	ENSCO	6/8/89	PCIA			
	4,650 gallons	ENSCO	6/9/89	PCIA			
	2,750 gallons*	ENSCO	6/12/89	PCIA			
	5,000 gallons	ENSCO	6/12/89	Comm. Cartage			
	2,400 gallons**	ENSCO	6/12/89	PCIA			

Total: 37,490 gallons

^{*} includes 600 gallons of TCE from PCIA

^{**} includes 450 gallons of TCE from PCIA

¹ All disposal was financed by PCIA ² All transportation was financed by PCIA

TABLE 2

SUMMARY OF DAILY MINI-ERCS CONTRACTOR EXPENDITURES* CIWH, Alsip, Illinois May 25 - June 12, 1989

DATE	DAILY TOTAL
5/25/89	\$ 2,394.91
5/26/89	2,955.47
6/1/89	3,324.65
6/8/89	1,253.18
6/9/89	790.35
6/12/89	1,181.44
	\$14,464.84

^{*} Based on estimated costs from U.S. EPA forms 1900-55

expenditures submitted by MAECORP amounted to \$14,464.84. Table 3 provides a breakdown of the expenditures into the four major categories of equipment, expendable materials, labor and subcontractors. In addition to the ERCS contractor, costs were incurred by the TAT and the U.S. EPA. A total clean-up costs summary is presented in Table 4.

2.0 EFFECTIVENESS OF REMOVAL ACTION

2.1 Responsible Party

Mr. K. Prunsky, son of CIWH's former owner Mr. A. Prunsky, was identified as CIWH owner and president. Although Mr. K. Prunsky was unwilling to conduct a removal action in accordance with the AO, he actively participated in the action. Mr. K. Prunsky obtained the services of PCIA, and two PCIA managers were present during the removal to provide technical support. Under an agreement with OSC Rupert, Mr. K. Prunsky paid for the transportation of the liquid waste off-site and provided off-specification TCE to the OSC free of charge. Mr. K. Prunsky also paid and arranged for the waste disposal through ENSCO. The U.S. EPA will be taking action to recover costs incurred during the removal action.

2.2 State and Local Agencies

Information compiled by the IEPA and the Village of Alsip regarding conditions at the CIWH site proved valuable to the U.S. EPA. Members of the Cook County Health Department and the Alsip Fire Department visited the site periodically to monitor site activities. Due to lack of funding, equipment and manpower, no attempts were made by state and local authorities to clean up the site.

2.3 Federal Agencies

The U.S. EPA was the only federal agency involved in the CIWH site cleanup. Actions taken by the U.S. EPA mitigated the explosion and fire threats posed to human health by the waste solvents.

3.0 PROBLEMS ENCOUNTERED

After all pumpable materials had been removed from the tanks, a one-half to one foot layer of sludge remained at the bottom. Attempts to remove the sludge with vacuum tankers proved unsuccessful. OSC Rupert decided to flush the tanks with TCE provided by PCIA and, in this manner, most of the sludge was effectively removed and shipped for disposal.

4.0 OSC RECOMMENDATIONS

TABLE 3

SUMMARY OF MINI-ERCS CONTRACTOR EXPENDITURES BY SERVICE CATEGORY* CIWH, Alsip, Illinois May 25 - June 12, 1989

SERVICE	AMOUNT
Equipment	\$ 2,439.44
Expendable Materials	1,313.82
Labor	6,641.58
Subcontractor	5,070.00
TOTAL	\$14,464.84

^{*} Based on estimated costs from U.S. EPA forms 1900-55

TABLE 4

SUMMARY OF TOTAL REMOVAL COSTS CIWH, Alsip, Illinois May 25 - June 12, 1989

ORGANIZATION AMOUNT

ERCS Contractor* \$14,464.84

U.S. EPA

TAT (as of 12/29/89) ___8,610.28

TOTAL

* Based on estimated costs from U.S. EPA forms 1900-55

ATTACHMENT A

TIMELINE OF EVENTS

TIMELINE OF EVENTS

CIWH SITE, ALSIP, ILLINOIS MAY - JUNE, 1989

ACTIVITY	25 Th	26 F	27 S	28 Su	29 	30 T	31 W	1 Th	2 F	3 S	4 Su	5 M	6 T	7 W	8 Th	9 F	10 S	11 Su	12 M	
Tank Pumping	< - >	·						< - >				- -			<	>			< - >	
Disposal of: Waste Flammable Liquids n.o.s.	e <->		< - >								<-	>			< - >					
Collection of Tank Samples		< - >	•					< - >												
Collection of Soil Samples		<-	•>																	
Drum Staging															<->					

ATTACHMENT B

SITE PHOTOGRAPHS



River Center, 111 North Canal Street, 8th Floor, Suite 855, SM Chicago, IL 60606 • (312) 993-1067 • FAX (312) 993-0226

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION EPA CONTRACT 68-01-7367

Mr. Duane Heaton Deputy Project Officer Emergency Support Section, 5 HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

February 2, 1990

TAT-05-G2-01392

Chicago Industrial Waste Haulers, Alsip, Illinois TDD# 5-8905-21

Dear Mr. Heaton:

On June 5, 1989, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to provide On-Scene Coordinator (OSC) support during the removal action at the Chicago Industrial Waste Haulers (CIWH) site in Alsip, Illinois.

The attached OSC Report summarizes the history of the CIWH site and describes activities involved in the mitigative action that occurred from May 25 to June 12, 1989. Included in the report are costs derived from the U.S. EPA 1900-55 forms, a timeline of events, and a list of appendices outlining the contents of the site The appendices will be forwarded to the U.S. EPA upon files. request.

Should you have any questions or require any additional information, please feel free to contact us.

Very truly yours,

ROY F. WESTON, INC.

Philip Fauble Geologist

William R. Doyle

Technical Assistance Team

Leader, Region V

PF:dn

Attachment

cc: L. Zintak, OSC

Roy F. Weston, Inc.

Major Programs Division

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,

and R.E. Sarriera Associates



РНОТО: 1

DESCRIPTION: View from the building looking west. Tanks #1,2,4 and Tanker T-1 in background. Tanks #7 and #3 in right

foreground.

SITE NAME: CIWH, Alsip, Illinois
DATE/TIME: 5/25/89, 1000 hours
PHOTOGRAPHER: M. O'Mara P.F.
FILM: 35mm, 200 ASA



РНОТО: 2

DESCRIPTION: Tanks #5 and #6 surrounded by containment diking. Fence and R.R. tracks in background. CIWH Site, Alsip, Illinois SITE NAME:

5/25/89, 1030 hours DATE/TIME:

PHOTOGRAPHER: M. O'Mara P.F. FILM: 35mm, 200 ASA



РНОТО: 3

DESCRIPTION: Tanker #T-1 at southwest corner of site.

SITE NAME:

CIWH Site, Alsip, Illinois 5/25/89, 1115 hours
M. O'Mara P.F.
35mm, 200 ASA DATE/TIME: PHOTOGRAPHER: FILM:



РНОТО: 4

DESCRIPTION: View of Tanker #T-2 and Tanks #5, #6 and #8 in

background from Tanker #T-1 looking north. SITE NAME: CIWH Site, Alsip, Illinois
DATE/TIME: 5/25/89, 1120 hours
PHOTOGRAPHER: M. O'Mara P.F.
FILM: 35mm, 200 ASA



PHOTO: 5

DESCRIPTION:

MAECORP crew pumping contents of Tanks #5 and #6

into Commercial Cartage Tanker.

SITE NAME: DATE/TIME: CIWH Site, Alsip, Illinois 2/25/89, 1130 hours M. O'Mara P.F.

PHOTOGRAPHER:

FILM:

35mm, 200 ASA



РНОТО: 6

DESCRIPTION: MAECORP decon line near Tank #8 (in background) in back of office trailer.

SITE NAME:CIWH Site, Alsip, Illinois DATE/TIME:5/25/89, 1140 hours PHOTOGRAPHER: M. O'Mara

FILM:

35mm, 200 ASA



PHOTO: 7

DESCRIPTION: Another view of Tanks #1,2,5,3 and 7 from the rear of the building.

CIWH Site, Alsip, Illinois SITE NAME:

DATE/TIME:5/26/89, 1540 hours PHOTOGRAPHER: M. O'Mara P.F 35mm, 200 ASA FILM:



РНОТО: 8

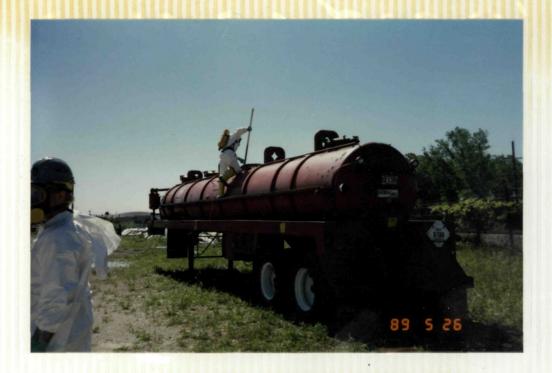
DESCRIPTION: Collection of soil samples in front of the office

trailer.

SITE NAME: DATE/TIME: CIWH Site, Alsip, Illinois 5/26/89, 0930 hours

PHOTOGRAPHER: M. O'Mara

35mm, 200 ASA



РНОТО: 9

MAECORP crew sampling contents of Tanker #T-2 DESCRIPTION:

CIWH Site, Alsip, Illinois 5/26/89, 1035 hours SITE NAME: DATE/TIME:

PHOTOGRAPHER: M. O'Mara P.F. 35mm, 200 ASA FILM:



РНОТО: 10

MAECORP crew preparing to pump contents of Tanks #5 and #6 into Commercial Cartage tanker. DESCRIPTION:

SITE NAME: CIWH Site, Alsip, Illinois

DATE/TIME: 5/26/89, 1147 hours

PHOTOGRAPHER: M. O'Mara P.F. FILM: 35mm, 200 ASA